

**SCURA, WIGFIELD, HEYER,  
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*Attorneys for 4907 Bergenline LLC*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

*In re:*

NATIONAL REALTY INVESTMENT  
ADVISORS, LLC, ET AL.,

Debtor

Case No. 22-14539

Chapter 11

Hon. Judge: John K. Sherwood

Hearing Date and Time: August 30, 2022 @  
10:00 A.M.

*Oral Argument Requested If Opposition Filed*

**NOTICE OF MOTION FOR AN ORDER GRANTING RELIEF FROM THE  
AUTOMATIC STAY TO PROCEED WITH STATE COURT ACTION CONCERNING  
CLAIMS OF DAMAGE TO REAL PROPERTY AGAINST INSURER**

**PLEASE TAKE NOTICE** that on August 30, 2022 at 10:00 A.M., or as soon thereafter counsel may be heard, 4907 Bergenline LLC (the “Creditor” or the “Plaintiff”), by and through their attorneys, Scura, Wigfield, Heyer, Stevens & Cammarota, LLP, hereby moves (the “Motion”) pursuant to 11 U.S.C. § 362 for relief from the automatic stay to allow the parties to continue with state court action concerning real property damage claims to establish liability and recovery to the extent of any applicable insurance before the Honorable John K. Sherwood, United States Bankruptcy Court District of New Jersey, 50 Walnut Street, Newark New Jersey 07102.

**PLEASE TAKE FURTHER NOTICE** that, in the event that timely objections are not filed with the Court and served upon the undersigned counsel as provided in D.N.J. L.B.R.9013-

1(a) and (f), the relief requested shall be deemed uncontested and the Court may, in its discretion, grant the requested relief.

**PLEASE TAKE FURTHER NOTICE** that any answering papers or objections to the Debtor's motion must be filed and served at least seven (7) days before the return date of this motion. If you wish to object to this motion, you must file responding papers stating with particularity the basis of your objection to the motion. All such responsive papers must be filed with the Clerk of the Bankruptcy Court for the District of New Jersey, located at 50 Walnut Street, Newark, New Jersey, and served simultaneously upon, David Stevens, as counsel for the Creditor, at 1599 Hamburg Turnpike, Wayne, New Jersey; and

**PLEASE TAKE FURTHER NOTICE** that oral argument is only requested if the motion is contested or so directed by the Court; and

**PLEASE TAKE FURTHER NOTICE** that this matter does not involve complicated issues of law or fact and therefore no brief is necessary.

**SCURA, WIGFIELD, HEYER,  
STEVENS & CAMMAROTA, LLP**

By: /s/ David L. Stevens  
David L. Stevens  
Attorneys for Creditor 4907 Bergenline LLC

Dated: August 8, 2022